







VOC TEST METHODOLOGY

-  Not proposing to include GC Method at this time
-  Revise and seek EPA approval of AQMD Method 313, including an endpoint marker
-  Continue to meet with VOC Test Methodology Working Group

VOC TEST METHODOLOGY

Comment

-  Concerns with the implication on the definition of the VOC by switching to GC method.

Response

-  This is a critical aspect of the VOC Test Methodology and staff looks forward to an open dialogue on the issue of the VOC definition.
-  Based on internal data, GC results tend to be lower than Method 24

AQMD Laboratory Data: Method 24 versus GC Method

Coating Type	Method 24 g/L Material	GC g/L Material
Clear Concrete Sealer	80	71
Concrete Curing Compound	27	16
Flat Coating	8	2
Flat Coating	2	1
Flat Varnish	94	90
Interior Latex Flat	18	1
Interior Latex Flat	20	2
Interior Latex Flat	4	3
Interior Semi Gloss	33	26
Non-Flat Coating	80	66
Primer, Sealer, & Undercoater	63	45
Varnish	124	86
Waterproofing Concrete Sealer	38	12

**AQMD Laboratory Data:
Compounds the Elute after
Methyl Palmitate**

-  Butyl Phthalate
-  Benzyl Phthalate

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Comment

-  VOC endpoint should not be determined by boiling point of marker compound. Thermogravimetric Analysis (TGA) is the most sound approach.

Response

-  Staff is open to discussions and additional studies on the end point and interested in any data that can be presented.
-  Currently conducting evaporation studies.

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 Test Method for Diverse Coatings Regulated by Rule 1113:

- Multi-component Coatings
 - Waterborne
 - Solvent based
- Non-film Forming (oily) Coatings
- Solvent Based Coatings
- Low VOC Waterborne Coatings
 - Water Analysis by Karl Fischer or Subtraction




